



Draft Representation Report 2024–2025

(Section 12(5)–12(7) of the *Local Government Act 1999*)

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1. Introduction

Section 12(3) of the *Local Government Act 1999* (the Act) indicates that the Council must undertake a “representation review” to determine whether the community would benefit from an alteration to Council’s composition and/or ward structure.

Section 12(4) of the Act states: “A review may relate to a specific aspect of the composition of the council, or of the wards of the council, or may relate to those matters generally – but a council must ensure that all aspects of the composition of the council, and the issue of the division, or potential division, of the area of the council into wards, are comprehensively reviewed under this section at least once in each relevant period that is prescribed by the regulations”.

Representation reviews are generally undertaken every eight (8) years, and the Minister for Local Government has specified that the City of Norwood Payneham & St Peters (the Council) is required to undertake and complete a review during the period April 2024 – April 2025. The review outcome must be published in the Government Gazette by 1 January 2026, and any changes will come into effect at the next Local Government elections in November 2026.

This report has been prepared in accordance with the requirements of Sections 12(5) and 12(6) of the Act. It sets out the elector representation proposal that Council believes should be carried into effect at the next Local Government elections; provides information pertaining to matters relevant to the composition and structure of Council; and presents an analysis of how Council’s proposal relates to the relevant provisions and principles prescribed under Sections 26(1)(c) and 33 of the Act.

The key issues that need to be addressed during the review include:

- the number of Elected Members of Council that are required to provide fair and adequate representation to the community;
- the division of the Council area into Wards, or alternatively the abolition of Wards; and
- if applicable, the preferred future Ward structure, the level of Ward representation and the name/title of any proposed future Wards.

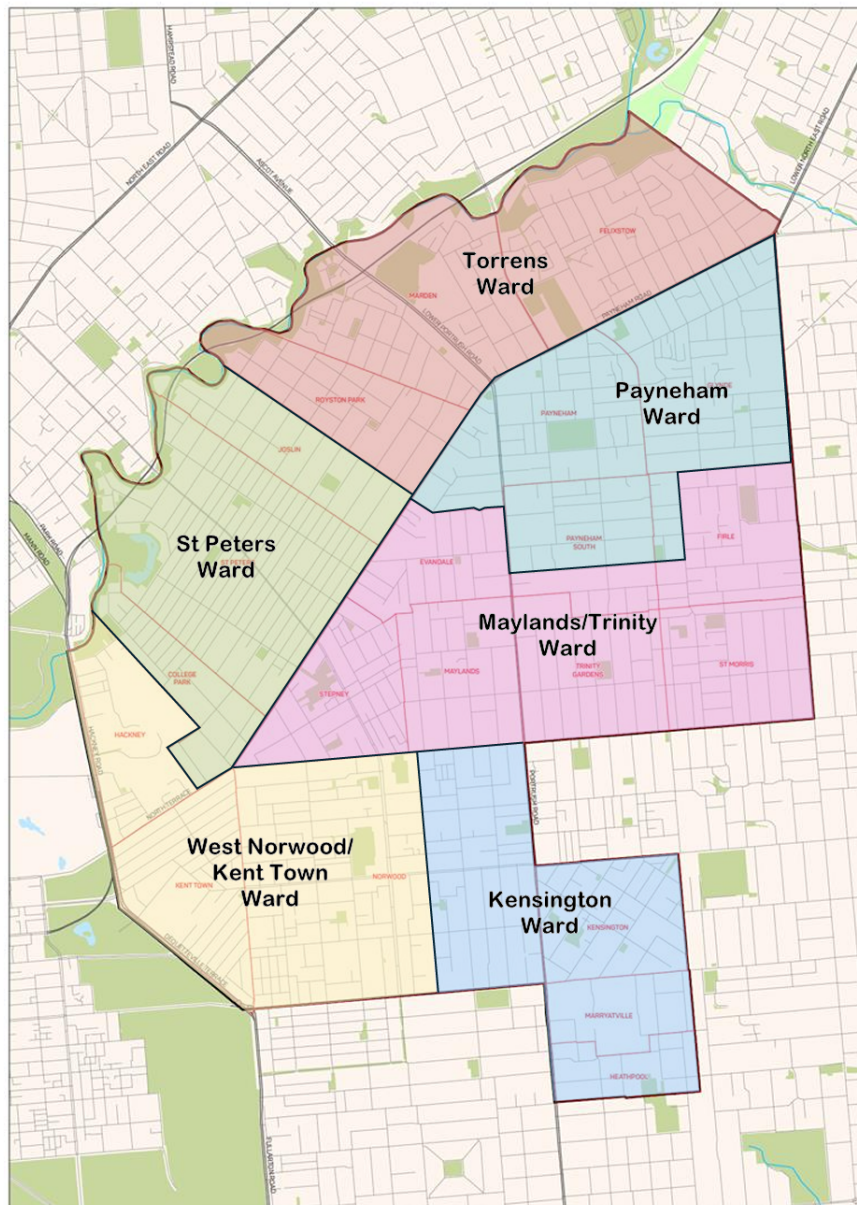
Whilst the proposal presented herein reflects the current position of the Council, no final decision will be made in respect to the Council’s future composition and/or structure until consideration has been given to any and all public submissions which may be received during the prescribed public consultation stage.

2. Background

The City of Norwood Payneham & St Peters covers approximately 15.1km²; and had an estimated resident population of 39,312 as at 30 June 2023. According to the Electoral Commission SA, there were 26,260 eligible electors within the Council area as at 24 April 2024, this equates to an elector ratio (i.e. the average number of electors represented by a Councillor) of 1:2,020.

The Council area is currently divided into six (6) Wards, as described hereinafter and depicted on Map 1. One Ward (Maylands/Trinity) is represented by three (3) Ward Councillors, and each of the remaining five (5) Wards are represented by two (2) Ward Councillors. The Mayor is the fourteenth and Principal Member of Council. This arrangement formally came into effect at the Local Government elections in November 2018.

Map 1: Current ward structure



The St Peters Ward comprises the suburbs of Joslin, St Peters and College Park.

The Torrens Ward comprises the suburbs of Felixstow, Marden and Royston Park.

The Payneham Ward comprises the suburbs of Payneham and Glynde, and parts of the suburbs of Firlie and Payneham South.

The Maylands/Trinity Ward comprises the suburbs of the Stepney, Maylands, Evandale, St Morris and Trinity Gardens, and parts of the suburbs of Firlie and Payneham South.

The West Norwood/Kent Town Ward comprises the suburbs of Hackney and Kent Town, and part of the suburb of Norwood.

The Kensington/East Norwood Ward comprises the suburbs of Kensington, Marryatville and Heathpool, and part of the suburb of Norwood.

The distribution of electors between the existing Wards is detailed in Table 1.

Table 1: Elector numbers and ratios for the existing wards.

Ward	Crs	H of A Roll	Council Roll	Electors	Ratio	% Variance
St Peters	2	3,836	0	3,836	1:1,918	- 5.05
Torrens	2	4,264	4	4,268	1:2,134	+5.64
Payneham	2	3,942	4	3,985	1:1,993	- 1.36
Maylands/Trinity	3	6,040	3	6,043	1:2,014	- 0.28
West Norwood/Kent Town	2	4,308	10	4,318	1:2,159	+6.88
Kensington/East Norwood	2	3,841	8	3,849	1:1,925	- 4.73
Total	13	26,231	29	26,260		
Average					1:2,020	

Source: Electoral Commission SA, 24th April 2024

Whilst the elector ratios in each of the existing Wards still lay within the specified quota tolerance limits (refer 8.3 Quota, page 18), the existing composition of Council is at odds with the “members cap” specified under Section 11A of the Act (refer 4.4 Number of Councillors, page 9).

Council commenced its review on 29 April 2024 with an Elected Member Information Briefing Session on matters relevant to the review. A subsequent Information Briefing Session was conducted on 22 May 2024 at which time the Elected Members further discussed matters relevant to the review supported by a Discussion Paper which provided further information, including potential Ward structure options. Key issues of discussion have included:

- the “member cap” specified under Section 11A of the Act;
- the continued division of the Council area into Wards, as opposed to the abolition of Wards;
- the number of Elected Members required to provide adequate and fair representation;
- the provisions of Sections 26(1)(c) and 33 of the Act, in particular the requirement to avoid over-representation in comparison with councils of a similar size and type; and
- the anticipated population growth over coming years, and the likely impacts thereof upon elector representation across the Council area.

At the meeting held on 5 August 2024 Council identified the preferred (in principle) option in respect to its future composition and Ward structure.

3. Proposal

Having duly considered all relevant provisions of the Act and considerable information in relation to the primary issues pertaining to the review, Council proposes the following in respect to its future composition and structure.

- The Principal Member of Council will be a Mayor elected by the community (as per the requirements of Section 51 of the Act).
- The future elected body of Council will comprise the Mayor and eleven (11) Ward Councillors.
- The Council area will be divided into four (4) Wards, as depicted in Map 2 and described as follows:

Ward 1: Comprising the suburbs of Marden, Felixstow, Royston Park, Payneham and Glynde.

Ward 2: Comprising the suburbs of Joslin, St Peters, College Park, Hackney and Kent Town.

Ward 3: Comprising the suburbs of Firle, Payneham South, Evandale, Stepney, Maylands, Trinity Gardens and St Morris.

Ward 4: Comprising the suburbs of Norwood, Kensington, Marryatville and Heathpool.

- The proposed wards will be identified as:

Ward 1 – Payneham / Felixstow Ward.

Ward 2 – St Peters / Kent Town Ward

Ward 3 – Trinity / Maylands Ward

Ward 4 – Kensington / Norwood Ward

- Proposed Wards 1, 3 and 4 (i.e. proposed Payneham / Felixstow Ward, Trinity / Maylands Ward and Kensington / Norwood Ward) will each be represented by three (3) Ward Councillors, whilst proposed Ward 2 (St Peters / Kent Town Ward) is to be represented by two (2) Ward Councillors.

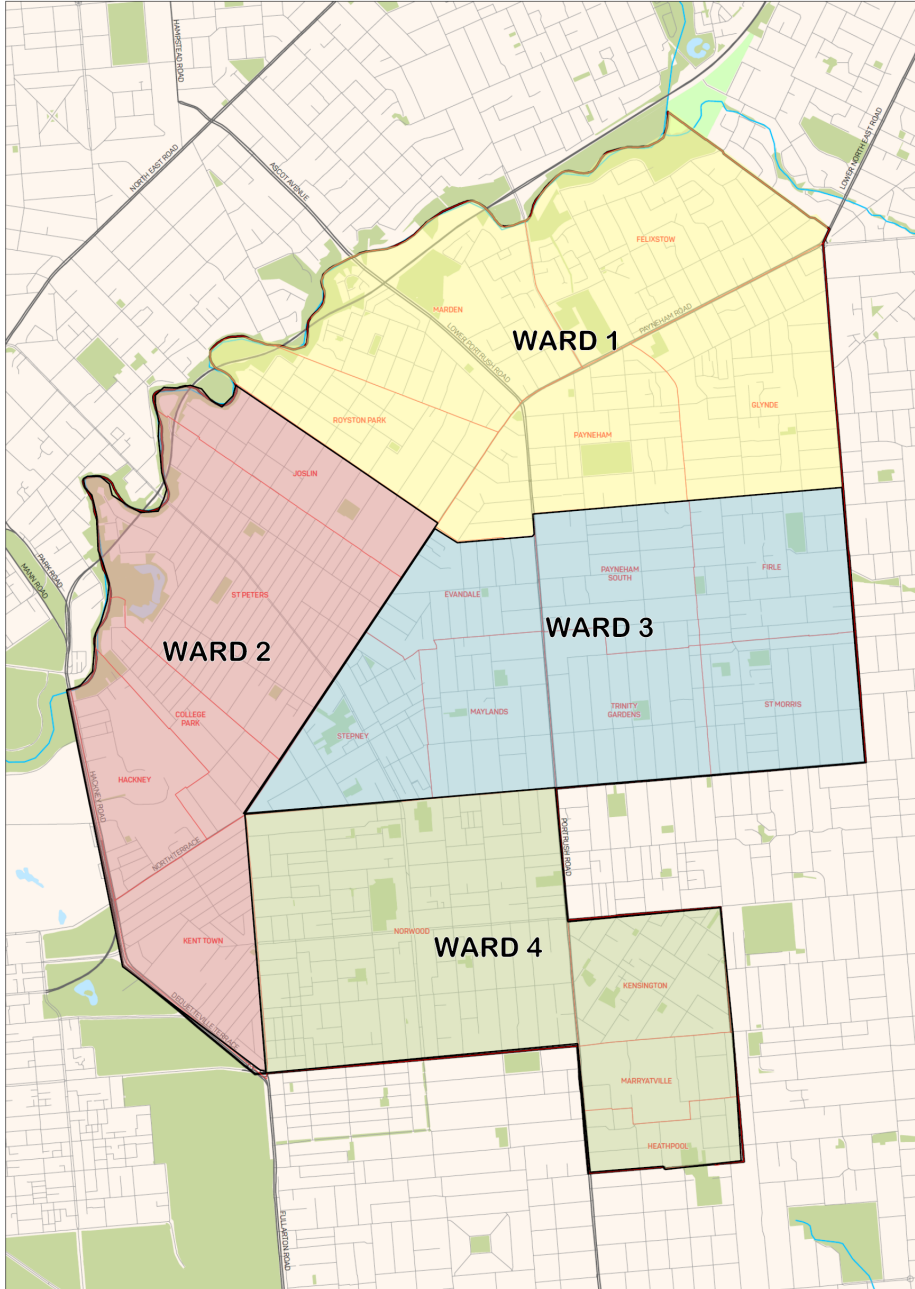
The distribution of electors between the proposed Wards is detailed in Table 2, and the reasons for Council's "in principle" decisions, together with an analysis of compliance with the relevant provisions and requirements of the Act, are provided hereinafter.

Table 2: Elector distribution between proposed wards.

Ward	Councillors	Electors	Ratio	% Variance
Ward 1	3	7,212	1:2,404	+2.84
Ward 2	2	4,993	1:2,497	+6.80
Ward 3	3	6,780	1:2,260	-3.32
Ward 4	3	6,728	1:2,243	-4.06
Total	11	25,713		
Average			1:2,338	

Source: Electoral Commission SA, House of Assembly Roll (March 2024)
Council Voter's Roll (March 2024)

Map 2: Proposed ward structure



4. Proposal Rationale

4.1 Composition

Section 51 of the Act stipulates that the Principal Member of Council must be elected by the electors of for the Council area as a representative of the area as a whole (or appointed by the Governor under circumstances prescribed under Section 10 of the Act); and is to be called Mayor. The Act no longer affords any alternative.

Section 52(1) of the Act specifies that all Members of Council, other than the Principal Member, shall have the title of Councillor.

Section 52(2) states that a Councillor will (depending on how the Council is constituted):

- be elected by the electors of the Council area, as a representative of the area as a whole (whether or not the area is divided into Wards); or
- if the area is divided into Wards, be elected by the electors of a particular Ward, as a representative of the Ward.

4.2 Wards/No Wards

The Council area has been divided into Wards since it was established in November 1997.

Currently two (2) of the nineteen (19) metropolitan councils (i.e. the Towns of Gawler and Walkerville) have no Wards, as do thirty-five (35) of the forty-nine (49) regional councils.

The Council acknowledges that the “no Ward” alternative could befit the smaller of the metropolitan councils; affords electors the opportunity to vote for all of the vacant positions on Council; automatically absorbs fluctuations in elector numbers; allows for the most supported candidates from across the Council area to be elected; and supposedly enables the Elected Members to be free of parochial Ward attitudes. Notwithstanding this, the Council is concerned that the “no Ward” alternative:

- does not guarantee direct representation of all communities within the Council area;
- may make it easier for single interest candidates and/or groups to gain support (than does the existing Ward based system);
- has the potential to make the task and expense of contesting "council-wide" elections difficult and excessive; and
- has the potential to increase the cost of conducting elections and supplementary elections, given that under the “no Wards” structure all contested elections must be conducted on a "Council-wide" basis.

On the other hand, the Council believes that a Ward structure:

- guarantees a level of direct representation of all areas and communities within the Council area;
- ensures local interests and/or issues are not overlooked in favour of the bigger “city-wide” picture; and
- provides recognizable lines of communication with the Council through the Ward Councillors.

It is also considered that Ward Councillors can have empathy for, and an affiliation with, the constituents and communities within their Ward; and Ward Councillors deliberate and make decisions on the basis of achieving the best outcome for their Ward and the whole of the Council area (as would be the role of an Area Councillor under the "no Ward" alternative). Further, the community knows and accepts the division of the Council area into Wards, and the structure and level of representation that it provides. As such, the retention of a Ward structure will likely be perceived as an indication of stability within the Council and Local Government in general.

Given the aforementioned, the Council supports the on-going division of the Council area into Wards.

4.3 Proposed Ward Structure

During the course of the review Council has considered numerous Ward structures based on ten (10), eleven (11) and twelve (12) Councillors.

The Council favours the proposed Ward structure because it:

- is relatively simple in configuration;
- complies with the "Member Cap" specified under Section 11A of the Act;
- is reasonably well balanced in terms of the proportional distribution of electors between the proposed Wards, and the resulting Ward elector ratios;
- exhibits Ward elector ratios which lay well within the specified quota tolerance limits (and are therefore capable of sustaining reasonable future fluctuations in elector numbers);
- has relatively consistent and higher levels of representation within the proposed Wards which should provide the electors/residents located therein with fervent and direct representation;
- will provide sufficient opportunities for aspiring candidates to Council (and the individual Wards);
- will provide a level of Ward representation which will ensure continued representation within a Ward under circumstances whereby a Ward Councillor or Councillors are absent or unavailable;
- should maintain reasonable and manageable workloads for the Ward Councillors;
- proposes Wards which are not large in area and, as such, should provide an environment wherein close relationships between Ward Councillors and their constituents can still be fostered, and Ward Councillors can be more familiar with the issues and/or concerns within their Ward.

Given all of the aforementioned, the Council's preference to introduce a new, four (4) Ward structure is considered to be rational and justifiable.

4.4 Number of Councillors

The Council has comprised the Mayor and fourteen (14) Ward Councillors since the Local Government election in 2018.

Section 11A of the Act specifies that a Council must not be comprised of more than thirteen (13) members, including the Mayor. However, the Act also allows a Council to seek an "exemption certificate" from the Electoral Commissioner if it desires to retain more than the specified maximum number of Elected Members.

The Council proposal to reduce the number of Elected Members to twelve (12), being the Mayor and eleven (11) Ward Councilors, is in keeping with the requirement and intent of the Act.

When determining its preferred future composition, the Council also considered the following:

- Section 12(6)(a)(i) of the Act specifically required the Council to examine the question of whether the number of Elected Members should be reduced. The Act is silent on the issue of a potential increase in the number of Elected Members.
- Whilst Ward Councillors are elected to provide representation of (and assistance to) the constituents within their Wards, they also act in the best interest of the whole community within the Council area. This includes approximately 13,000 or more residents who are not enrolled to vote but have the same day-to-day concerns and issues which confront the eligible electors throughout the Council area. As the demands and needs of the whole of the local community directly impact upon the workloads of the Elected Members, the greater the number of Elected Members the greater the lines of communication between Council and the greater the likelihood that the Elected Members will be capable of providing an adequate service to the local community.
- It is anticipated that the population of the City of Norwood Payneham & St Peters will grow in the foreseeable future as a consequence of urban infill and redevelopment (refer 5.2 Population and Demographic Trends, page 12). Whilst it is difficult to quantify the future population growth with any certainty at this time, the anticipated increase in the population of the Council area over the next eight (8) years (i.e. the next scheduled representation review) will obviously result in greater elector numbers, higher elector ratios and greater demands being placed upon the Elected Members (both individually and as a collective body). A reduction in the number of Elected Members at this time will afford Council the opportunity to re-assess its composition in the future, knowing that there will be some flexibility in regard to the "Member Cap".
- There must be sufficient Elected Members to manage the day-to-day affairs of Council; provide adequate and readily available lines of communication between Council and the community; and ensure that the potential for diversity in the Elected Member's skill sets, experience and backgrounds is maintained.

The Council believes that it is important to reach a balance between adhering to the intent of the Act (in regard to the future number of Elected Members) and providing fair and adequate representation to, and of, the local community. Ultimately, the Council is of the opinion that the proposed future composition of eleven (11) Ward Councillors and the Mayor will meet both objectives at this time and will provide leeway (in regard to the "Member Cap") should future circumstances warrant the consideration of an additional Councillor.

5. Legislative Requirements

The provisions of Sections 26(1)(c) and 33 of the Act require the Council to consider, as far as practicable, the following when developing a proposal that relates to its composition and structure.

Section 26(1)(c) requires that, when considering a reform proposal, the Council should have regard to a list of principles, the most relevant being the following:

- Proposed changes should, wherever practicable, benefit ratepayers.
- A Council should reflect communities of interest of an economic, recreational, social, regional or other kind, and be consistent with community structures, values, expectations and aspirations.
- Residents should receive adequate and fair representation within the local government system, while over-representation in comparison with Councils of a similar size and type should be avoided (at least in the longer term).

Section 33(1) requires that, in the formulation of a proposal that relates to the boundaries of a ward or wards, the review must also take into account, as far as practicable:

- the desirability of reflecting communities of interest of an economic, social, regional or other kind;
- the population of the area, and of each Ward affected or envisaged by the proposal;
- the topography of the area, and of each Ward affected or envisaged by the proposal;
- the feasibility of communication between electors affected by the proposal and their elected representatives;
- the nature of substantial demographic changes that may occur in the foreseeable future; and
- the need to ensure adequate and fair representation while at the same time avoiding over-representation in comparison to other Councils of a similar size and type (at least in the longer term).

Finally, Section 33(2) of the Act requires that a proposal which relates to the formation or alteration of Wards of a Council must observe the principle that the number of electors represented by a Councillor must not, as at the relevant date (assuming that the proposal was in operation), vary from the Ward quota by more than 10 per cent.

The Council's comments, as they relate to the relevant provisions of Sections 26 and 33 of the Act, are as follows.

5.1 Communities of Interest

The Act speaks of the desirability of reflecting communities of interest of an economic, social, regional or other kind.

“Communities of interest” have previously been defined “as aspects of the physical, economic and social systems which are central to the interactions of communities in their living environment”, and are generally identified by considering factors relevant thereto, including neighbourhood communities; history and heritage communities; sporting facilities; community support services; recreation and leisure communities; retail and shopping centres; work communities; industrial and economic development clusters; and environmental and geographic interests.

The Council area covers approximately 15.1 km² and incorporates twenty-one (21) suburbs (or part suburbs). Council is keen to ensure that, where possible, identified “communities of interest” are maintained in their entirety within the boundaries of a Ward, taking into account the features of the landscape; the location of, and connection between, the various communities; and the distribution of the electors. In order to achieve this, Council proposes a Ward structure wherein all suburbs are maintained in their entirety within a Ward.

In addition, whilst the community will have to adapt to the physical configuration of the proposed new Ward structure, the level of representation in each of the proposed Wards will be increased to three (3) or four (4) Councillors, thereby increasing the lines of communication between the Ward Councillors and their constituents.

5.2 Population and Demographic Trends

Further residential development and urban renewal (and therefore population growth) is expected across the Council area in the future.

The following information provides some insight into the demographic trends that have occurred over recent years, and the extent of the anticipated future population increase. This information has been taken into account by Council when determining its preferred future ward structure.

Data sourced from Electoral Commission SA indicates that the number of electors within the Council area has increased at varying rates during the period 2010 – 2023. Overall, during the cited period the number of enrolled electors increased by 1,484 or 6.01%.

The Department of Planning, Transport and Infrastructure (Local Area (SA2 and LGA), Population Projections for South Australia, 2021 – 2041, published March 2024) indicates that the population of the Council area is anticipated (medium series) to increase by 6,284 people or 16.6% (i.e. 37,823 to 44,107) during the period 2021 – 2041.

Data provided by the Australian Bureau of Statistics (refer 3218.0 Regional Population Growth, Australia) indicates that the estimated population of the Council area has generally increased from year to year during the period 2001 – 2023; and overall increased by 5,766 people or 17.19% during the specified period (i.e. 33,546 to 39,312). The same data indicates that the population increased by 2,316 people or 6.27% during the recent five-year period 2018 – 2023 (i.e. 36,996 to 39,312).

Australian Bureau of Statistics "Quick Stats" indicate that the estimated population of the Council area increased by 5,215 people or 16.16% over the period 2001 – 2021 (i.e. 32,272 to 37,487).

According to the City of Norwood Payneham & St Peters “community profile”, the estimated resident population of the Council area increased by 1,402 people or 4.01% (i.e. 34,967 to 36,369) during the period 2006 – 2015; and then increased by a further 2,943 people or 8.01% (i.e. 36,369 to 39,312) during the period 2015 – 2023. Overall, this equates to an increase of 4,345 people or 12.43% over the period 2006 – 2023.

Continued infill development is expected throughout the Council area; however growth opportunities are limited due to heritage and other constraints.

Further medium to high rise residential development is likely to occur (on an ad hoc basis) along the arterial roads which radiate out of the Adelaide CBD (e.g. Kensington Road, The Parade, Payneham Road, Magill Road, North Terrace and Rundle Street) and on Dequetteville Terrace.

Residential development of a significant size and scale (i.e. apartment buildings) is most likely to occur in and about the suburbs of Norwood, Kent Town and perhaps Stepney.

5.3 Topography

The City of Norwood Payneham & St Peters is a long-existing, developed inner eastern municipality which covers an area of approximately 15.1 km².

The terrain generally slopes from the east and south to the west and north-west, towards the River Torrens which forms one boundary of the City; and four creeks traverse the Council area from east to west. In addition, the urban form of the Council area is diverse, ranging from reasonably homogenous residential areas to commercial and mixed-use precincts. There is also a significant area of open space in the River Torrens Linear Park.

It is considered that the proposed future Ward structure is a relatively simple and efficient division of the Council area which, in the main, befits and accommodates the existing pattern of development and topographical features of the Council area. Further, Council believes that the topography of the Council area should have little or no physical impact upon the proposed future Ward structure, given that the proposed Ward boundaries align with long-established suburb boundaries, thereby ensuring that entire “communities of interest” (suburbs) are maintained within a proposed Ward.

5.4 Feasibility of Communication

Council believes that the Mayor and eleven (11) Ward Councillors can provide adequate lines of communication between the Elected Members of the Council and the community, taking into consideration the anticipated future growth in elector numbers; the size of the Council area; the nature and density of the urban development within the Council area; and the continual advancements being made in regard to telecommunications and information technology.

5.5 Adequate and Fair Representation

Sections 26(1)(c) and 33(1) of the Act seek to ensure adequate and fair representation while at the same time avoiding over-representation in comparison to other Councils of a similar size and type (at least in the longer term). However, such a comparison is not necessarily a straightforward exercise, given that no two (2) councils are identical in terms of their size (elector numbers and/or area), character, population, topography or communities of interest.

Table 3 provides (for comparison purposes) the elector data, elector ratios (i.e. the average number of electors represented by a Councillor), and the size/area of the metropolitan councils. The data indicates that the City of Norwood Payneham & St Peters is one of the smaller metropolitan councils in terms of area, elector numbers and elector ratio, yet currently has one of the higher numbers of Elected Members.

Table 3: Elector representation – Metropolitan councils

Council	Councillors	Electors	Elector Ratio
Walkerville (1.34 km ²)	8	5,849	1: 731
Prospect (7.81 km ²)	8	15,268	1:1,909
Gawler (41.10km ²)	10	20,200	1:2,020
Norwood Payneham & St Peters (15.1 km²)	13	26,260	1:2,020
Unley (14.29 km ²)	12	27,989	1:2,332
Holdfast Bay (13.72 km ²)	12	28,595	1:2,383
Adelaide Hills (795.1 km ²)	12	30,954	1:2,580
Burnside (27.53 km ²)	12	32,347	1:2,696
West Torrens (37.07 km ²)	14	43,192	1:3,085
Adelaide (15.57 km ²)	9	30,437	1:3,382
Campbelltown (24.35 km ²)	10	37,184	1:3,718
Mitcham (75.55 km ²)	12	49,516	1:4,126
Playford (344.9 km ²)	15	71,441	1:4,763
Port Adelaide/Enfield (97.0 km ²)	17	90,157	1:5,303
Charles Sturt (52.14 km ²)	16	90,641	1:5,665
Marion (55.5km ²)	12	68,314	1:5,693
Tea Tree Gully (95.2 km ²)	12	74,791	1:6,233
Salisbury (158.1 km ²)	14	98,878	1:7,063
Onkaparinga (518.4 km ²)	12	133,756	1:11,146

Source: Electoral Commission SA (24th April 2024)
 * City of Adelaide also comprises two (2) "Area Councillors".

A reduction in the number of Councillors to eleven (11), as proposed, will:

- be in accord with the provisions and intent of the Section 11A of the Act;
- be consistent with the elector representation arrangements of thirteen (13) other metropolitan councils which currently comprise between eight (8) and twelve (12) Councillors;
- serve to increase the elector ratio to 1:2,387 which (on current elector data) which will be appropriate in comparison to the elector ratios exhibited by other metropolitan councils; and
- result in some financial savings (e.g. Elected Member's annual allowance of \$19,110) which can be redirected into programs to benefit the community.

5.6 Quota

Ward quota is the number of electors within a Ward divided by the number of Ward Councillors, whereas the “elector ratio” for the Council area is the total number of electors divided by the number of Councillors (i.e. the Mayor is excluded).

Given the aforementioned, any potential future Ward structure must incorporate Wards wherein the distribution of electors is equitable, either in terms of numbers (if the Wards have equal representation) or elector ratio. Under the latter circumstance, the elector ratio within each Ward must be within 10% of the average elector ratio for the Council area. The Act only allows for the 10% quota tolerance limit to be exceeded in the short term if demographic changes predicted by a Federal or State government agency indicate that the Ward quota will not be exceeded at the time of the next periodic Local Government election.

As indicated in Table 2 (refer part 3 ‘Proposal’ on page 5), the elector ratios in each of the proposed Wards lay well within the specified quota tolerance limits.

6. Current Public Consultation

In accordance with Section 12(7) of the Act, interested persons are invited to make a written submission to Council in respect to this report, and more specifically the composition and structure that Council proposes to introduce at the date of the next Local Government elections in November 2026.

Interested members of the community are invited to make a submission expressing their views on the future composition and structure of the Council.

Submissions can be made as follows and will be accepted until **5:00pm Friday 31 January 2025**: ○

via the online comments form provided on Council's Website: www.npsp.sa.gov.au; or

- emailed to Governance@npsp.sa.gov.au; or
- delivered to the Council offices at 175 The Parade, Norwood; or
- sent by Australia Post addressed to the Manager Governance, City of Norwood Payneham & St Peters, PO Box 204 Kent Town 5071 (ensure to allow enough time to be received within the consultation period).

Further information regarding the Representation Review can be obtained by contacting Jenny McFeat, Manager Governance, on telephone 83664555 or email jmcfear@npsp.sa.gov.au.